

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, ET AL.

Plaintiffs,

v.

BRIAN KEMP, ET AL.

Defendants.

**Civil Action
No. 1:17-cv-02989-AT**

**REQUEST BY COALITION PLAINTIFFS FOR TELEPHONE STATUS
CONFERENCE**

Plaintiffs Coalition for Good Governance, Laura Digges, William Digges, and Ricardo Davis (the “**Coalition Plaintiffs**”) respectfully request a telephone status conference, and in connection therewith state:

1. On November 30, 2017, this Court stayed and administratively closed this case pending appearances of new counsel for Plaintiff Coalition for Good Governance. (Doc. 117.)
2. On January 18, 2018, this Court granted the motion of Steptoe and Johnson to withdraw from representing the remaining Plaintiffs and directed the individual Plaintiffs to advise of their new counsel. (Doc. 135.)

3. On February 27, 2018, this Court directed the individual plaintiffs to give notice of their intent to proceed either pro se or with new counsel and directed their counsel, if any, to appear by April 2, 2018. (Doc. 144.)

4. On March 30, 2018, in their notice of intent to proceed with new counsel, Plaintiffs Curling, Price and Schoenberg requested a status conference. (Doc. 150.)

5. As of the date of filing of this Request, all Plaintiffs are represented by counsel.

6. On April 4, 2018, the Coalition Plaintiffs filed their motion for leave to file a proposed third amended complaint (the “TAC”) in respect of their claims. (Doc. 160.)

7. Because this case concerns voting rights and the general election is scheduled for November 2018, only approximately seven months away, the Coalition Plaintiffs wish at the earliest opportunity to discuss the schedule of this case going forward, particularly since they intend to file a motion for preliminary injunction aimed at avoiding the complained-of constitutional violations in the November 2018 general election.

8. Specifically, the Coalition Plaintiffs believe that at least some of the following matters merit discussion between the Court and the parties:

- a. The need for an expedited schedule for briefing on the Coalition Plaintiffs' pending motion for leave to amend.
- b. The need for an expedited filing and briefing schedule for any subsequent Rule 12 motions directed at the TAC.
- c. The need of the Coalition Plaintiffs to conduct discovery in advance of their anticipated preliminary-injunction motion and pending the resolution of any Rule 12 motions directed at the TAC.
- d. A schedule for the filing, briefing, and hearing of the Coalition Plaintiffs' anticipated motion for preliminary injunctive relief.

9. The Coalition Plaintiffs plan to confer with counsel for all parties about the foregoing issues in advance of the date set by the Court for a conference to the extent schedules permit.

10. Lead counsel for Coalition for Good Governance previously advised this Court of his unavailability during April 16–20, 2018. (Doc. 133.) Given this unavailability, the Coalition Plaintiffs respectfully request that the requested telephone status conference be set for any day outside of this absence period that the Court's schedule allows.

WHEREFORE, the Coalition Plaintiffs respectfully request that this Court set a telephone status conference at the Court's convenience between now and April 13, 2018.

Dated: April 5, 2018.

Respectfully submitted,

/s/ Bruce P. Brown

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CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2018, I electronically filed the foregoing REQUEST BY COALITION PLAINTIFFS FOR TELEPHONE STATUS CONFERENCE with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Adam Martin Sparks
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I hereby certify that I served the foregoing to the following non-ECF participants by United States Postal Service (or other consented-to electronic means pursuant to Fed. R. Civ. P. 5(b)(2)(C), (E), or (F)), as required by Standing Order No. 16-01, Ex A, at § H II.B.3, NDGA:

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